



*Consulting Engineers
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March 23, 2011
(PBW Project No. 1597)

VIA FEDERAL EXPRESS

Mr. Gary Miller, On-Scene Coordinator
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Rita Engblom, On-Scene Coordinator
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

**RE: FINAL REMOVAL ACTION REPORT
GULFCO MARINE MAINTENANCE SUPERFUND SITE
FREEPORT, TEXAS**

Dear Mr. Miller and Ms. Engblom:

Please find enclosed four (4) copies (Mr. Miller) and one copy (Ms. Engblom) of the Final Removal Action Report for the Gulfco Marine Maintenance Superfund Site (the Site). This report was prepared by Pastor, Behling & Wheeler, LLC (PBW) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy), and The Dow Chemical Company (Dow) pursuant to Section VIII, Paragraph 42 of the Administrative Settlement Agreement and Order on Consent for Removal Action (Settlement Agreement) and the schedule in Section II.A of the Removal Action Work Plan (Appendix D to Settlement Agreement) for the above-referenced Site. Parker Drilling Company has recently begun participating in the Site work under an agreement it reached with the above Respondents.

This final report incorporates the modifications requested in EPA's March 9, 2011 letter approving the draft report dated February 24, 2011. Those modifications and our responses indicating how the modifications have been incorporated into this Final Removal Action Report are attached to this letter. A redline-strikeout showing the text changes between the draft and final reports is also attached for your reference.

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Please let me know if you have any questions or comments regarding this report.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', written over the company name.

Eric F. Pastor, P.E.
Principal Engineer

cc: Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Ray Merrell – Sequa Corporation
Mr. John Eldridge – Haynes and Boone, LLP
Mr. Donnie Belote - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP (w/o enclosure)
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP
Mr. Jay Winters – Golder Associates, Inc.